

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



April 23, 2013

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the 2013 Aerospace Spotlight Awards Gala hosted by the American Institute of Aeronautics and Associates (AIAA) on May 8, 2013

On May 8, 2012, the American Institute of Aeronautics and Astronautics (AIAA), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a gala event including a reception and dinner at the Ronald Reagan Building, in Washington, D.C., beginning at approximately 6:30 PM.

Approximately 500 people have been invited to attend, including personnel from other executive branch agencies, the media, congressional members and staff, and leaders in aerospace-related work from industry, academia, and the not for profit sector. The ticket price of the gala reception and dinner, including all food and beverages, is \$250 per person. At the event, various individuals—including U.S. Government employees— will receive professional recognition for significant contributions to aeronautics and astronautics. AIAA controls the seating of its guests.

I find that this event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the gala will allow NASA representatives to exchange information on NASA programs and policies with key personnel from throughout the U.S. aerospace community.

Accordingly, NASA employees whose duties do not substantially affect the AIAA, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest from AIAA for free attendance to the event. However, NASA employees whose duties may substantially affect AIAA, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local NASA ethics counselor.

AIAA will also be holding a luncheon on the day of the gala at the same location. Approximately 300 invitations have extended for the luncheon to senior leaders throughout the

aerospace industry representing a diversity of interests, as well as to senior government officials. The value of the meal will be approximately \$50. AIAA will also control the seating of its guests for the luncheon, which is held to encourage government and corporate interaction. For the same reasons noted above for the evening gala, NASA employees who receive an invitation for the luncheon from the AIAA may accept it. Unlike the gala, however, lunch invitations are only extended to the employee and not to an additional guest.

NASA employees who receive an invitation to either the gala or the luncheon from a person or party other than the AIAA should seek an individual determination from their local NASA ethics counselor.



Adam F. Greenstone